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11 CHURCH OF SCIENTOLOGY OF CALIFORNIA

12  
13 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
14 FOR THE COUNTY OF LOS ANGELES

15 CHURCH OF SCIENTOLOGY OF )  
16 CALIFORNIA, a California )  
corporation, ) Case No. C420153  
17 )  
Plaintiff, ) PLAINTIFFS' EVIDENTIARY  
18 ) OBJECTIONS TO DECLARATION  
vs. ) OF JOSEPH A. YANNY  
19 )  
GERALD ARMSTRONG; DOES 1 )  
20 through DOE 10, inclusive, )  
21 Defendants. ) DATE: December 23, 1991  
TIME: 9:00 a.m.  
DEPT: 56  
22 GERALD ARMSTRONG, )  
23 Cross-Complainant, )  
vs. )  
24 )  
25 CHURCH OF SCIENTOLOGY OF )  
CALIFORNIA, a California )  
26 corporation; L. RON HUBBARD; )  
and DOES 1 through 100, )  
inclusive, )  
27 Cross-Defendants.)

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1 Plaintiff Church of Scientology of California submits the  
2 following evidentiary objections to the declaration of Joseph A.  
3 Yanny. In support of his motion for leave to intervene in the  
4 above action:

5 1. Paragraph 9 (" The information...in the Armstrong file  
6 is of critical importance to my defense in Religious Technology  
7 Center v. Yanny.") consists of a pure conclusion, in that the  
8 term "critical importance" reflects nothing more than the  
9 unsubstantiated, subjective opinion of Yanny. Nowhere does Yanny  
10 indicate what information he seeks, why it is of "critical  
11 importance" or when he needs it.

12 2. The statement in paragraph 10 ("my ability to defend  
13 myself is also undermined if I am unable...to conduct further  
14 discovery if the offensive terms of the settlement agreement are  
15 enforced.") contains a pure conclusion in that the term  
16 "undermined" reflects nothing more than the subjective,  
17 unsupported opinion of Yanny. Nowhere does he indicate what  
18 discoveries he wants to conduct, or why its absence would  
19 "undermine" his defense.

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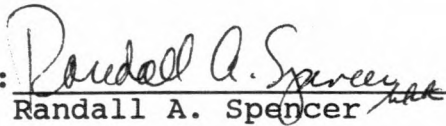
Based upon the foregoing reasons, plaintiff requests that its objections be sustained and that the foregoing statements in Yanny's declaration not be considered.

Date: December 18, 1991

Respectfully Submitted

ERIC M. LIEBERMAN  
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By:   
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PROOF OF SERVICE

STATE OF CALIFORNIA        )  
                                  )    ss.  
COUNTY OF LOS ANGELES    )

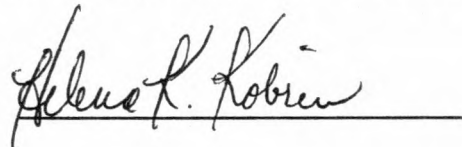
I am employed in the County of Los Angeles, State of California. I am over the age of eighteen (18) years and not a party to the within action. My business address is 6255 Sunset Boulevard, Suite 2000, Hollywood, CA 90028.

On December 18, 1991, I caused the foregoing document described as PLAINTIFFS' EVIDENTIARY OBJECTIONS TO DECLARATION OF JOSEPH A. YANNY to be served on interested parties in this action, to the persons at the addresses set forth as follows:

**SEE ATTACHED SERVICE LIST**

If hand service is indicated, I caused the above-referenced paper to be served by hand, otherwise I caused such envelopes, with postage thereon fully prepaid, to be placed in the United States mail at Hollywood, California.

Executed on December 18, 1991 at Hollywood, California.

  
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